

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 18-CR-20489

Plaintiff,

Thomas L. Ludington
United States District Judge

v.

JAMES D. PIERON, JR.,

Patricia T. Morris
United States Magistrate Judge

Defendant.

_____ /

Government's Notice of Intent to Offer FRE 404(b) Evidence

The government hereby gives notice to the defendant of the government's intent to offer evidence pursuant to Rule 404(b) of the Federal Rules of Evidence. The evidence, both testimonial and in the form of an exhibit (bates 25576), will be that the defendant did not pay employee withholding taxes to the United States for the employees of Komplique, the defendant's solely-owned business at the relevant time. The testimony and exhibit will be offered as evidence of the defendant's plan and intent to evade the payment of taxes he owed to the United States.

Respectfully submitted,

Date: February 25, 2019

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United States Attorney

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CERTIFICATE OF SERVICE

On February 25, 2019, I filed the above document with the court using the ECF system which will automatically serve counsel of record.

s/Janet Parker